

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

SVETLANA LOKHOVA,

Plaintiff,

v.

STEFAN A. HALPER,

Defendant.

No: 1:20-cv-01603-LMB-WEF

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

COMES NOW, undersigned Plaintiff's Counsel, and moves this Honorable Court for leave to withdraw from this matter and in support thereof states:

1. As disclosed at the hearing before the Court last Friday, September 2, 2022, within the two weeks prior to that date (after the filing of the Motion to Dismiss and For Summary Judgment on August 19, 2022), Plaintiff Lokhova contacted Counsel and advised that she was terminating Counsel's services in this matter.
2. Counsel therefore moved orally for leave to withdraw as required by Rule 1:16(a)(3) of the Virginia Rules of Professional Conduct.
3. At that time, the Court declined to grant the motion to withdraw and ordered Counsel to, among other things, make attempts to inform

Ms. Lokhova that the Court had ordered that the scheduled deposition on September 6, 2022 be physically relocated to take place in London. The Court indicated that it wanted to “wait and see” what happened with the deposition before making a further decision about Counsel withdrawing.

4. Counsel therefore made concerted efforts to advise Ms. Lokhova of the new location for the deposition.
5. Ms. Lokhova contacted Counsel in writing the night before the deposition to advise that she was unable to appear for the deposition, which Counsel conveyed to Defense Counsel. Ms. Lokhova also reiterated that she no longer wished Counsel to represent her in this matter.
6. Counsel anticipated reporting these developments to the Court at the already scheduled hearing in this matter on September 9, 2022 on the Motion to Dismiss and For Summary Judgment, and to move again orally for leave to withdraw.
7. As the Court has ordered Counsel to file a written motion for leave to withdraw today, September 8, 2022, if she no longer represents Ms. Lokhova, Counsel hereby moves for leave to withdraw from this matter.

WHEREFORE, it is respectfully requested that the Court permit counsel leave to withdraw from this case.

Dated: September 8, 2022

Respectfully Submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that, on September 8, 2022, I electronically filed the foregoing Notice of Plaintiff's Intention to File an Amended Complaint, using the CM/ECF system, which will send a notification of such filing (NEF) to all properly designated parties and counsel.

_____/s/_____
Leslie McAdoo Gordon